



TO: Clerk's Office
 UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF NEW YORK

APPLICATION FOR LEAVE
 TO FILE DOCUMENT UNDER SEAL

UNITED STATES

-v-

25-MJ-172

Docket Number

SHARON GOHARI

SUBMITTED BY: Plaintiff Defendant DOJ

Name: Andrew D. Reich

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INDICATE UPON THE PUBLIC DOCKET SHEET: YES NO
 If yes, state description of document to be entered on docket sheet:

DATED: Brooklyn
 05/19/2025

, NEW YORK

Vera M. Scanlon

U.S. MAGISTRATE JUDGE

RECEIVED IN CLERK'S OFFICE 05/18/2025

DATE

MANDATORY CERTIFICATION OF SERVICE:

A.) A copy of this application either has been or will be promptly served upon all parties to this action, B.) Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: ; or C.) This is a criminal document submitted, and flight public safety, or security are significant concerns.
 (Check one)

Tisha Dorn
 05/18/2025

DATE

SIGNATURE

NJM:ADR
F. #2025R00082

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -
SHARON GOHARI,
Defendant.

----- X

To Be Filed Under Seal

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT

(18 U.S.C. § 2252(a)(2))

Case No. 25-MJ-172

EASTERN DISTRICT OF NEW YORK, SS:

SCHUYLER KENNEY, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about and between January 11, 2024, and November 11, 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SHARON GOHARI did knowingly and intentionally receive one or more visual depictions using a means and facility of interstate and foreign commerce, which depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(2))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since 2021. I am currently assigned to the FBI's New York Joint Terrorism Task Force ("JTTF"), where I am responsible for conducting investigations involving terrorism, national security, threats relating to Iran, and other offenses involving the use of computers and the Internet. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, interviews with witnesses, and reports of other law enforcement officers involved in the investigation.

PROBABLE CAUSE

2. The defendant SHARON GOHARI is a naturalized United States citizen from Iran who resides in Roslyn, New York. On or about January 24, 2025, GOHARI participated in a voluntary interview with FBI agents at John F. Kennedy International Airport ("JFK") in Queens, New York, in connection with a JTTF investigation, after returning from Iran through Doha, Qatar.

3. During the interview, the defendant SHARON GOHARI provided his verbal and signed written consent for FBI agents to conduct a search of his mobile device, a midnight blue iPhone 13 with serial number GV2WWD6H7Q (the "Device"). GOHARI indicated that the Device belonged to him and provided it to FBI agents along with the password. On or about February 7, 2025, even though GOHARI had consented to a full review of the Device, in an abundance of caution, FBI agents obtained judicial authorization to search the

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Device. *See* 25-MC-541. On or about March 7, 2025, FBI agents obtained expanded judicial authorization to search the Device for evidence of child sexual abuse material. *See id.*

4. I reviewed the Device pursuant to the defendant SHARON GOHARI's signed written consent and the judicial authorizations described above. During that review, I came across multiple videos depicting what appeared to be child sexual abuse, as described further below. The videos were sent to GOHARI by an unknown WhatsApp user with an Iranian phone number in a WhatsApp conversation that spanned from on or about November 28, 2022, through on or about January 24, 2025.

5. In particular, on or about January 11, 2024, the defendant SHARON GOHARI received: (i) a 44-second video depicting a male anally penetrating with his erect penis a prepubescent female who appears to be approximately five years old; (ii) a 1-minute 13-second video depicting a male vaginally penetrating with his erect penis a prepubescent female who appears to be approximately ten years old; and (iii) a 3-minute 29-second video depicting a prepubescent female who appears to be approximately ten years old displaying and touching her vagina and anus and being touched by another individual on her vagina and anus.

6. Following receipt of the videos, on or about that same day, the defendant SHARON GOHARI exchanged messages in Farsi with the sender. Based on an unofficial draft translation by FBI personnel I understand that, in sum and substance, GOHARI asked about the sender's sexual activities that night, the sender indicated that he desired to have sexual relations with "younger" individuals, and GOHARI responded that they should go together to a high school for that purpose.

7. On or about November 11, 2024, the defendant SHARON GOHARI received an additional video from the same WhatsApp account. In particular, GOHARI

received a 2-minute 42-second video depicting two prepubescent females who appear to be approximately eight to ten years old removing their clothes and acting out various sexual positions on a bed. Just before sending the video, the sender stated in Farsi, in sum and substance, and based on an unofficial draft translation by FBI personnel, that he was curious to know where the girls in the video were located, and asked GOHARI to watch the video and to tell him what language the girls were speaking. GOHARI responded, in Farsi, "Russian."

8. I also reviewed additional photos and videos stored on the Device. During the course of that review I observed hundreds of photos and videos of what appeared to be women in various public places throughout New York City, including on trains and at cafes, who did not appear to be aware that they were being photographed or recorded. Some of the photos and videos appeared to be taken at close range, including several photos that were angled in an apparent attempt to capture the insides of the women's skirts or other garments. Other photos and videos depicted the same women in multiple locations, indicating that the women had been followed.

WHEREFORE, your deponent respectfully requests that the defendant SHARON GOHARI be dealt with according to law. Because public filing of this document could result in a risk of flight by GOHARI, as well as jeopardize the government's ongoing investigation, your

deponent respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

/s/ Schuyler Kenney

SCHUYLER KENNEY
Special Agent
Federal Bureau of Investigation

by telephone

Sworn to before me this
19 day of May, 2025

Vera M. Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK